

FORM TO BE USED BY A PRISONER FILING A
42 U.S.C. § 1983 CIVIL RIGHTS COMPLAINT
IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

I. CAPTION

Dontae Anderson et al
(Enter the full name of the plaintiff or plaintiffs)
v.

Lehigh County Prison et al
City of Allentown
(Enter the full name of the defendant or defendants)

II. PARTIES

a. Plaintiff

Full name: Dontae Anderson et al

Prison Identification number: 184122

Place of present confinement: Lehigh County Prison

Address: 38 N. 4th St Allentown Pa 18101

Place of confinement at time of incidents or conditions alleged in complaint, including address:

Lehigh County Prison

Additional plaintiffs: Provide the same information for any additional plaintiffs on the reverse of this page or on a separate sheet of paper.

b. Defendants: (list only those defendants named in the caption of the complaint, section I)

1. Full name including title: Lehigh County Prison

Place of employment and section or unit: Allentown Pa.

2. Full name including title: Kyle Russel Warden

Place of employment and section or unit: Lehigh County Prison

3. Full name including title: Janine Donate Director

Place of employment and section or unit: Lehigh County Prison

4. Full name including title: The City of Allentown

Place of employment and section or unit: Allentown Pa.

Additional defendants: Provide the same information for any additional defendants on the reverse of this page or on a separate sheet of paper.

Jawon H. Johnson

196246

Kamar Thompson

206109

Class A: Plaintiffs

Full Name

Inmate #

Nathaniel Montos

206485

Chad Frankfield

13559

Martin Jesus Lopez

105326

Thomas Toble

33529

Jordan German

168864

Mark Schlacter

9120

Alex De Jesus

204035

Dontae Anderson

184122

Sharian Lucas

75882

Shamece Clark

183788

John Garner

199522

Tarrance Garner

191450

Jose Rivera

200457

Christopher Melton

204053

Josue Santiago Serpa

169325

Josean Maldonado

0204926

Gabriel Ramas

0204978

Benji Dyer

204214

Richard Jones

0205431

Steven Jamal Williford

205307

Address of all person.

38 N. 4th St, Allentown PA 18101

Place of incident

Lehigh County Prison

Class B	Plaintiffs	Inmate #
Martin	Jesus Lopez	105326
Thomas	Koble	33529
Dontaie	Anderson	184122
Sherian	Lucas	75882
Jordan	German	168864
Shamree	Clark	183788
John	Garner	199522
Tarrance	Garner	191450
Jose	Rivera	2004053
Richard	Jones	0205431
Jewson H.	Johnson	196246

Address of all Plaintiffs

38 N. 4th St Allentown Pa, 18101

Place of incident

Felch County Prison

III. PREVIOUS LAWSUITS

Instructions:

If you have filed other lawsuits in any federal or state court dealing with the same facts as this complaint or other facts related to your imprisonment, you must provide the information requested below. If you have not filed other lawsuits, proceed to Section IV, Administrative Remedies, on this page.

If you have filed other lawsuits, provide the following information.

Parties to your previous lawsuit:

Plaintiffs _____

Defendants _____

Issues: _____

Court: if federal, which district? _____

if state, which county? _____

Docket number: _____ *Date filed:* _____

Name of presiding judge: _____

Disposition: (check correct answer(s)): Date: _____

Dismissed _____ *Reason?* _____

Judgment _____ *In whose favor?* _____

Pending _____ *Current status?* _____

Other _____ *Explain* _____

Appeal filed? _____ *Current status?* _____

Additional lawsuits. Provide the same information concerning any other lawsuits you have filed concerning the same facts as this action or other facts related to your imprisonment. You may use the back of this page or a separate sheet of paper for this purpose.

IV. ADMINISTRATIVE REMEDIES

Instructions:

Provide the information requested below if there is an administrative procedure to resolve the issues you raise in this complaint. Examples of administrative procedures include review of grievances, disciplinary action, and custody issues. If no administrative procedures apply to the issues in this complaint, proceed to Section V, Statement of Claim, on page 4.

- a. Describe the administrative procedures available to resolve the issues raised in this complaint:

Type of procedure. (grievance, disciplinary review, etc.)

written and verbal address to Admin.

Authority for procedure. (DC-ADM, inmate handbook, etc.)

DC-ADM, handbook

Formal or informal procedure. both

Who conducts the initial review? Administrator

What additional review and appeals are available? grievance

denied

- b. Describe the administrative procedures you followed to resolve the issues raised in this complaint before filing this complaint:

On what date did you request initial review? day of admittance

What action did you ask prison authorities to take? remove lock down

order more time out of cell

What response did you receive to your request? CDC guidelines

to lock us down.

What further review did you seek and on what dates did you file the requests? _____

None

What responses did you received to your requests for further review?

- c. If you did not follow each step of the administrative procedures available to resolve the issues raised in this complaint explain why?

change and compensation for harm done

V. STATEMENT OF CLAIM

Instructions:

State here as briefly as possible the facts of your case. Use plain language and do not make legal arguments or cite cases or statutes. State how each defendant violated your constitutional rights. Although you may refer to any person, make claims only against the defendants listed in the Caption, Section I. Make only claims which are factually related. Each claim should be numbered and set forth in a separate paragraph with an explanation of how the defendants were involved. Use the reverse of this page or a separate sheet of paper if you need more space.

Statement of Claim:

Its a deprivation of Due Process, protection from punishment before conviction, Deliberate indifference to the well being of our mental and physical health. Reckless endangerment, Their measure, for covid19 where excessive concern to cause harm, so they should have known. Failure to do the most important safety precautions for covid prevention.

Attached papers
statement of Claims 6 pages.

VI. RELIEF

Instructions: Briefly state exactly what you want the Court to do for you.

Relief sought:

Compensatory, nominal, monetary and punitive damages for pain and suffering now and future, distress, constitutional injury, mental anguish, in the amount of \$100,000,000 - for harm done.

VII. DECLARATION AND SIGNATURE

I (we) declare under penalty of perjury that the foregoing is true and correct.

7/13/21

DATE



SIGNATURE OF PLAINTIFF(S)

Statement of Claim

This action is brought forth by two Class of inmates, Class A seek damages for harm incurred by the lock down covid19 measure's, implamented by warden Kyle Russel, Director Janine Donate of the Lehigh County Prison.

In the Month of March, 2020 LCP implamented lock down measure along with the rest of the nation, do to covid19.

The lock down on the nation was lifted.

The Bureau of Prisons issued an aggressive Pandic Response, with all faciltie attempted to mirror.

All civilian contact was suspended except for needed personnel, vendors, medical and maintenance, and all inmates where locked down for 14 to 28 days.

If covid was Identified then to continue the lock down as a quarantine measure for 21 days.

The suspension of visits, treatment, education, and religious services. Do to the aggressiveness these measure where only to be use for the above cited.

These restrictive measure are more restrictive then Ad-seg solitary confinement, which was design to deter negative behavior as a punishment.

Solitary confinement has been clearly establish as a sever psychological deprivation, causing mental health disorder, insanity, and a alarming rate of suicide.

LCP has had these lock down measures in effect for over a year. Being the Warden & Director they are or should be aware of the psychological effects of Solitary Confinement, and the excessive overly aggressive, restrictive lock down measure's.

You cant call cow shit stake and expect it to taste like a new yorker or a porter house.

The effect's of the restrictiveness are going to ~~worse~~^{even} worse then the effects of Ad-seg or Solitary because the restrictiveness is worse.

They suspended visit, treatment, education, and most damaging religious services, even taken God away from its detainees.

Class A of this action some suffer from pre-existing mental health disorders that have been exacerbated, some have incur disorders like sever depression, anxiety, paranoia, P.T.S.D, humiliation, diabetes hyper-tension from lack of movement forcing sever weight gain.

Some taken multiple psychotropic medication.

Their excessive policy was a reckless indifference, deliberate indifference, a disregard for the mental health of its wards.

To be subjected to such treatment as a pretrial detainee is cruel and unusual punishment, cruel and unusual ~~confinement~~ confinement, a substantive shockingly conscience Dur Process violation and a complete and utter denial of equal protection.

The right to person security is historic, by them restraining ~~my~~ over liberty they have taken on the responsibility, and have failed. They provided no enhance ventilation, nor did enough to protect us from their staff, who come in and out of the facility with out quarantining ~~at all~~ or isolating them selv's, from others.

So the inmate's in Class B have contracted covid and suffered mild to sever symtem's even being hospitalized, because there is not full information on covid, its infection may cause future harm or death.

This is a substantive 8th and 14th Amendment violation where Warden Russel and Director Donate fail protect it wards, and to provided their medical needs. Its deliberate-indifference where they refuse to do what was needed to protect its, wards from this air born biological deadly virulent, a complete and reckless disregard to the health and safty of its wards.

Knowing they could not protect or would not protect they should have relenguish custody, so we can protect our selve's.

Defendant The City of Allentown, we hold liable for the Lehigh Count Prison.

VI. Relief

We seek damages, compensatory, nominal, monetary and punitive, for pain & suffering, future pain & suffering, distress, mental anguish, constitutional injury, for ever day spent in cruel and unusual confinement and for contracted covid19 in the amount of \$100,000,000, one hundred million dollars.

All defendants in their official capacity and Russel & Donato in their individual capacity all so.

Also seek to have the 22 to 23 cell confinement up lifted and to have one contact visit a month. One 15 minute free phone call a day, mental health groups, and religious service's, and a special diet for people recovering from covid19, a enhance nutrition diet, fresh vegible, fresh fruit, more protien, ensure of some typ of health shake to help with those in long recovery of covid19.

NAME: *Danbe Anderson* 189132
LEHIGH COUNTY JAIL
36 NORTH 4TH STREET
ALLENTOWN, PA 18102-3489

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U.S. Dist. Clerk ED of Pa.
2009 US Courthouse
601 Market Street
Philadelphia, PA 19106-1797



U.S.M.S.
X-RAY

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